

FILED

PRO PER:

Delray Richardson p/k/a Delray d/b/a Del Funk Boy Music
and Sterling A. Snyder d/b/a Zion Records

2191 E. 21st Street, Box - K
Signal Hill, CA 90755
323-440-0855

DELRAY RICHARDSON p/k/a DELRAY
d/b/a DEL FUNK BOY MUSIC, an
individual, and STERLING A. SNYDER
d/b/a ZION RECORDS, an individual,

Plaintiffs,

v.

CBS STUDIOS, INC., d/b/a CBS
TELEVISION DISTRIBUTION, a division
of CBS Corporation, a Delaware
Corporation,

Defendant.

CV12-7925 ABC (SHx)

#Case No.:

COMPLAINT FOR:

1. **COPYRIGHT INFRINGEMENT;**
2. **CONTRIBUTORY COPYRIGHT INFRINGEMENT;**
3. **VICARIOUS COPYRIGHT INFRINGEMENT;**
4. **UNJUST ENRICHMENT;**
5. **UNFAIR COMPETITION;**
6. **FRAUD;**
7. **NEGLIGENT MISREPRESENTATION; and**
8. **AN ACCOUNTING**

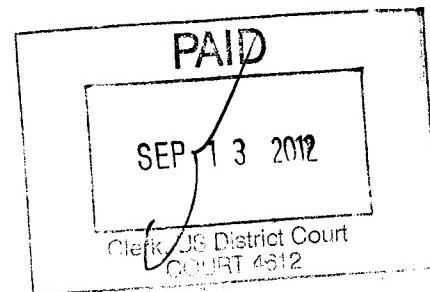
**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

COMPLAINT FOR COPYRIGHT INFRINGEMENT AND AN ACCOUNTING

Plaintiffs Delray Richardson p/k/a Delray d/b/a Del Funk Boy Music (“Delray”) and Sterling A. Snyder d/b/a Zion Records (“Snyder”) (collectively “Plaintiffs”) sue CBS Studios, Inc. d/b/a CBS Television Distribution (“CBS”), and state:

NATURE OF ACTION

1. This is a civil action seeking damages and injunctive relief for copyright infringement arising under 17 U.S.C. §§ 501, *et seq* (referred to herein as the “Copyright Act”), and other related causes of action.



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THE PARTIES

2. Plaintiff Delray is an individual residing in Los Angeles County, California.
3. Plaintiff Snyder is an individual residing in Los Angeles County, California.

4. Upon information and belief, Defendant CBS is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business in Los Angeles County, California. CBS is one of the major producers and distributors of television programs.

JURISDICTION AND VENUE

5. Federal jurisdiction is conferred on this Court by 28 U.S.C. §§ 1331 and 1338 in that the controversy arises under the Copyright Act of 1976 (17 U.S.C. 101 *et seq*). This Court also has jurisdiction over Plaintiff's state law claims under the general supplemental jurisdiction of this Court under 28 U.S.C. §1337.

6. Venue is proper in this Court under 28 U.S.C. §1331(b) because Defendants' conduct resulted in actionable conduct within this District.

7. This Court has personal jurisdiction over Defendants on the grounds that they are doing business in this State and District and have purposefully availed themselves of the jurisdiction of this Court by transacting business in this District and the State of California concerning the audio-visual works and copyrighted materials at issue in this action.

8. Defendants all prepare, among other things, television programming that is distributed and transmitted in the State of California and within this District. Defendants

have further distributed and transmitted within this State and District television programming that used Plaintiffs' copyrighted audio-visual works without authorization.

FACTUAL BACKGROUND

9. Plaintiff Delray is an established music producer and composer who, among other things, creates, composes, writes, arranges, programs, mixes, remixes, routes and processes sound recordings and underlying compositions for various musical recording artists and record companies.

10. Plaintiff Snyder is an established music executive and chief financial officer for recording company Zion Records which owns and controls the rights to (2) of the underlying sound recordings also known as the master recordings (the Master's).

11. Defendant CBS is a major American television network

12. In or around 2003, Plaintiff Delray invested substantial funds and time to compose the music and author the compositions entitled "Love You So", "I Don't Care", "Mr. Ex feat. Delray", "Church", "Bumpin", "Bongos", "Latin", "Red Balloon", "Sexy Baby", "Layla Song" "Slow Down", "Party" , "The Streets" , and "ODB" , (the "Delray Musical Compositions").

13. Thereafter, Plaintiff Delray recorded the sound recordings embodying the Delray Musical Compositions (the "Delray Sound Recordings"). The Delray Musical Compositions and the Delray Sound Recordings are original works created and authored by Plaintiff Delray.

14. In or around 2003, Plaintiff Snyder invested substantial funds and time in the production of the master recordings entitled "Give It To Me" and "Mr. EX feat. Delray" (the "Snyder Master Recordings"). The Delray Musical Compositions and the Snyder Sound Recordings are hereinafter collectively referred to as the "Musical Compositions / Sound Recordings."

15. Thereafter, Plaintiff Snyder recorded the sound recordings embodying the Musical Compositions (the "Snyder Sound Recordings"). The Snyder Sound Recordings and the Snyder Master Recordings are original works commissioned and financed by Plaintiff Snyder. The Delray Sound Recordings and the Snyder Sound Recordings are hereinafter collectively the "Sound Recordings".

16. Notably, Plaintiff Delray provided a featured songwriting and vocal performance for the musical composition and corresponding sound recording entitled "Mr. EX feat. Delray", a sound recording that was released on the 2003, debut album entitled "Zion". Plaintiff Delray's Musical Compositions and Sound Recordings have been labeled under someone else's name as well as a different title and thus those individuals have been collecting royalties from his copyrighted Musical Compositions and Sound Recordings since 2003. A complete list of Plaintiffs' Musical Works is annexed as Exhibit "A".

17. Plaintiffs are, and at all relevant times have been, the copyright owners or licensees of the exclusive rights under United States copyright with respect to the Musical Compositions and the Sound Recordings (the "Copyrighted Works"), The Register of Copyrights duly issued Plaintiffs a Certificate of Copyright Registration for Del-Funk-Boy Music Hits Collection, Del-Funk-Boy Music Paperwork Production Tracks Library

and ZION namely Registration #'s. PAU2-864-138 , SRU 1-073-146 , and SR 692-860, effective April 16th 2004, April 3rd 2012 and October 3rd 2011. A copy of Certificates is annexed as Exhibit "B".

18. Among the exclusive rights granted to Plaintiffs under the Copyright Act are the exclusive rights to reproduce the Copyrighted Works and to distribute the Copyrighted Works to the public.

19. Plaintiffs license and/or sublicense the subject Sound Recordings and Musical Compositions to third parties for a wide variety of commercial uses in television programming, commercials and infomercials, film and video among other outlets. In consideration for receiving such usage rights, third parties enter into agreements with Plaintiffs under which they are obligated to pay Plaintiffs license and/or service fees, the amounts of which vary depending on a variety of factors, including the nature and reach of the media outlet in question and the duration and territory of such use.

20. Defendant, however, instead of entering into an agreement with Plaintiffs regarding the licensed use of their Copyrighted Works, simply commandeered the subject Copyrighted Works, failing and/or refusing to compensate Plaintiffs in any respect, and proceeded to exploit the Copyrighted Works by synchronizing them on the television program America's Next Top Model for significant and appreciable commercial gain.

21. Defendants received no authorization or permission to reproduce and transmit these programming segments containing the subject Musical Compositions and Sound Recordings synchronized to audiovisual images, nor did Defendants receive or even request any license or permission to reproduce, broadcast and use the subject Musical Compositions and Sound Recordings in further promotion of its programming.

22. In essence, Defendant, without the consent of the Plaintiffs and in violation of Plaintiffs' rights under the United States Copyright Act, reproduced, exhibited, publicly performed and broadcasted program segments containing synchronized versions of the subject Musical Compositions and Sound Recordings without seeking or obtaining the copyright owners' permission.

23. Plaintiffs have never licensed or otherwise given permission to Defendant to license or cause the use of the subject Musical Compositions and/or Sound Recordings in synchronization with the programming or for the Defendant to authorize others to sell, copy, reproduce, display, distribute, perform digitally or synchronize the Musical Compositions or Sound Recordings in the United States as part of the programming or otherwise.

24. As Defendant has thoroughly failed to procure any license of any kind from Plaintiffs with respect to the subject Musical Compositions and Sound Recordings in connection with the television program America's Next Top Model, Defendant has no rights to copy, use, sell, distribute, transmit, perform, broadcast, display, create derivative works of or otherwise exploit the Sound Recordings.

25. Nevertheless, Defendant, has repeatedly and without authorization incorporated Plaintiffs' Musical Compositions and Sound Recordings into Defendants' television program America's Next Top Model, and Defendant has systematically and improperly caused such programming to be illicitly broadcast to the general public for commercial gain, both directly and indirectly through affiliated third parties, throughout the United States and worldwide when repackaged and rebroadcast.

26. Defendants' brazen infringement of Plaintiffs' copyrighted Musical

Compositions and Sound Recordings has involved at least fifteen (15) titles of Plaintiffs' copyrighted Sound Recordings which were broadcast on myriad separate and distinct occasions.

27. The Musical Compositions and Sound Recordings which Defendant has infringed and which are the subject of this action are domestic U.S. works which were duly registered with the United States Copyright Office.

28. Despite being put on notice of its ongoing infringements in or around April 2012, and despite Plaintiffs' multiple communications with Defendant since that time, Defendant has continuously refused to comply with Plaintiffs' demands. Further, despite these notices, Defendant has continued their unauthorized use and broadcasts of Plaintiffs' copyrighted Musical Compositions and Sound Recordings.

29. More troubling is the fact that other artists as well as these artist administrators in Defendant's stead are receiving unauthorized royalties for musical compositions not actually aired by Defendant, and that the "author" of these non-existent musical compositions appears fiduciary related to the music supervisor (Matthew M. Kierscht, Lawyer, CBS Music Supervisor) and /or the author of the actual cue sheets themselves (Donald Steever, CBS Music Operations Manager). Regardless, it is beyond peradventure that the discovery process shall illuminate and uncover the true nature and extent of the clear instances of infringement and fraud replete throughout Defendant cue sheets and episodes with respect to America's Next Top Model. In Season 10 Episode 05, there are a total of 179 songs on the cue sheet. Out of the 179 songs, there are 37 songs that are not actually played.

30. Plaintiffs' claims are not barred by the statute of limitations, as these

facts were discovered July 17th and August 19th 2011, Defendant was also made aware of these facts through email and certified mailing dated April 27th and May 2nd 2012, after a thorough and complete investigation.

31. Plaintiffs have fully-complied in all respects with applicable copyright law, including timely registering the subject musical works with the Copyright Office.

32. All conditions precedent to the institution of this action have been satisfied, discharged, excused, and/or waived.

COUNT I
COPYRIGHT INFRINGEMENT (17 U.S.C. §§ 501, et seq.)
(Against Defendant)

33. Plaintiffs repeat and re-allege each and every allegation contained in paragraphs 1 through 32 as if fully set forth herein.

34. As the owners of the original subject Musical Compositions and subject Sound Recordings, Plaintiffs are entitled to exclusive use and reproduction of the subject Musical Compositions and Sound Recordings without the unauthorized use by third parties.

35. Defendant, and each of their participating divisions and components, by their actions, infringed Plaintiffs' copyrighted Musical Compositions and Sound Recordings in using and/or licensing or otherwise authorizing others to sell, copy, reproduce, display, distribute, perform, broadcast and publish and otherwise use or enabling the Musical Compositions and Sound Recordings to be synchronized in their programming in the United States without crediting or compensating Plaintiffs and without Plaintiffs' permission.

36. Specifically, Defendant infringed Plaintiffs' copyrights in the Musical

Compositions by synchronizing the Sound Recordings and Musical Compositions to, among other things, the television production America's Next Top Model, and by reproducing, distributing, publicly performing, broadcasting and displaying these images via their networks in connection with their television programming.

37. Upon information and belief, Defendant has wrongfully copied and commercially exploited, without Plaintiffs' authorization, the Sound Recordings in their television programming broadcast to the general public, including but not limited to, in connection with the following television series: America's Next Top Model.

38. As a direct result of Defendant' repeated infringements of Plaintiffs' exclusive copyright rights in the Musical Compositions and Sound Recordings under 17 U.S.C. §106, Plaintiff has sustained substantial injury, loss and damage.

39. Upon information and belief, Defendant has unlawfully and wrongfully derived, and will continue to derive, income and profits from its infringing acts.

40. Upon information and belief, Defendant's infringements has been willful, intentional and purposeful and in complete disregard of, and with indifference to, the rights of Plaintiffs as evidenced by, among other things, the magnitude of Defendant's infringements.

41. Indeed, notwithstanding being put on notice of Plaintiffs' claims, Defendant has failed and/or refused to act to remedy their infringing conduct, and Defendant programming containing the unauthorized use of the Musical Compositions and Sound Recordings continues to be broadcast, sold and exploited for substantial gain.

42. Plaintiffs have complied in all respects with the Copyright Act of 1976 and all other laws governing copyrights. As such, Plaintiffs are entitled to the exclusive rights

and privileges in and to the Musical Compositions and Sound Recordings.

43. Upon information and belief, Defendant's television series, America's Next Top Model, which includes unauthorized uses of the Musical Compositions and Sound Recordings, has resulted in substantial viewer ship and revenue and has provided a substantial benefit to Defendants.

44. As a result of Defendant's infringement of Plaintiffs' exclusive rights to the Musical Compositions and Sound Recordings, Plaintiffs are entitled to the election of their actual damages or to statutory damages pursuant to 17 U.S.C. § 504(c).

45. Defendant's conduct is causing, and, unless enjoined and restrained by this Court, will continue to cause Plaintiffs great and irreparable injury that cannot be fully compensated or measured in money. Plaintiffs have no adequate remedy at law. Pursuant to 17 U.S.C. §§ 502 and 503, Plaintiffs are entitled to injunctive relief prohibiting Defendant and all parties acting in concert with Defendant CBS from further infringing Plaintiffs' Musical Compositions and Sound Recordings, and ordering Defendant and all third parties acting in concert with Defendant to destroy all copies of the Sound Recordings made in violation of Plaintiffs' exclusive rights.

COUNT II
CONTRIBUTORY COPYRIGHT INFRINGEMENT
(Against Defendant)

46. Plaintiffs repeat and re-allege each and every allegation contained in paragraphs 1 through 32 as if fully set forth herein.

47. Upon information and belief, Defendant engage various third parties, including but not limited to cable network providers (collectively, "Affiliates"), to reproduce, distribute and broadcast their television programming in various media

markets.

48. Upon information and belief, the Affiliates have infringed and continue to infringe Plaintiffs' exclusive rights in and to the Musical Compositions and Sound Recordings by reproducing and transmitting the Sound Recordings in an unauthorized manner through such Affiliates' own media outlets on behalf of Defendant.

49. Upon information and belief, Defendant enabled, induced, facilitated and materially contributed to each act of infringement by the Affiliates.

50. Upon information and belief, Defendant had and continue to have actual and constructive knowledge that Affiliates engaged in unauthorized use of the Sound Recordings. Acting with this actual and constructive knowledge, Defendant enabled, facilitated and materially contributed to Affiliates' copyright infringements, which could not occur without Defendant's enablement.

51. Defendant is liable as a contributory copyright infringer for the infringing acts of the Affiliates.

52. Upon information and belief, Defendant acts of contributory infringement have been willful, intentional, and purposeful, in disregard of, and with indifference to, the rights of Plaintiffs.

53. As a direct and proximate result of Defendant's contributory infringement of the Sound Recordings, Plaintiffs are entitled to the election of their actual damages or to statutory damages pursuant to 17 U.S.C. § 504(c).

54. Defendant conduct is causing, and, unless enjoined and restrained by this Court, will continue to cause Plaintiffs great and irreparable injury that cannot be fully compensated or measured in money. Plaintiffs have no adequate remedy at law.

Pursuant to 17 U.S.C. §§ 502 and 503, Plaintiffs are entitled to injunctive relief prohibiting Defendant from further contributing to the infringement of the Musical Compositions and Sound Recordings, and ordering Defendant to destroy all copies of the such recordings made in violation of Plaintiffs' exclusive rights.

COUNT III
VICARIOUS COPYRIGHT INFRINGEMENT
(Against Defendant)

55. Plaintiffs repeat and re-allege each and every allegation contained in paragraphs 1 through 32 as if fully set forth herein.

56. Upon information and belief, Affiliates have infringed and continue to infringe Plaintiffs' exclusive rights in the Sound Recordings by reproducing and transmitting the Sound Recordings in an unauthorized manner through such Affiliates' own media outlets on behalf of Defendant.

57. Upon information and belief, Defendant have and continue to have the right and the ability to supervise Affiliates' infringing conduct, and could have prevented Affiliates from infringing Plaintiffs' Sound Recordings. Upon information and belief, Affiliates' copyright infringements were carried out in furtherance of Defendant interests and subject to Defendant ultimate approval of the reproductions and retransmissions of the original television programs.

58. Upon information and belief, Defendant significantly and directly benefited from the widespread infringement of Plaintiffs' Sound Recordings by the Affiliates which have continued until the present time.

59. Upon information and belief, Defendant television programs which include unauthorized uses of the Sound Recordings have resulted in substantial viewer

ship and revenue and have provided a substantial benefit to Defendant.

60. Defendant are vicariously liable for the infringing acts of the Affiliates.

61. Upon information and belief, Defendant acts of vicarious infringement have been willful, intentional, and purposeful, in disregard of and indifferent to the rights of the Plaintiffs.

62. As a direct and proximate result of Defendant vicarious infringement of the Collective Copyrighted Recordings, Plaintiff are entitled to the election of their actual damages or to statutory damages pursuant to 17 U.S.C. § 504(c).

63. Defendant conduct is causing, and, unless enjoined and restrained by this Court, will continue to cause Plaintiffs great and irreparable injury that cannot be fully compensated or measured in money. Plaintiffs have no adequate remedy at law. Pursuant to 17 U.S.C. §§ 502 and 503, Plaintiffs are entitled to injunctive relief prohibiting Defendant from further infringing Plaintiffs' Sound Recordings, and ordering Defendant to destroy all copies of the Sound Recordings made in violation of Plaintiff's exclusive rights.

COUNT IV
UNJUST ENRICHMENT
(*In the Alternative - Against Defendant*)

64. Plaintiffs repeat and re-allege each and every allegation contained in paragraphs 1 through 32 as if fully set forth herein.

65. Defendant has received and obtained gains, advantages and benefits by using Plaintiffs' Musical Compositions and Sound Recordings for Defendant commercial purposes.

66. To the extent Defendant has exploited the Musical Compositions and

Sound Recordings without compensating Plaintiffs, Defendant has benefited to the detriment of Plaintiffs.

67. Plaintiffs have received no compensation in the form of royalties and/or copyright ownership interests in and for the exploitation of the Musical Compositions and Sound Recordings.

68. Moreover, despite Defendant having incorporated certain of Plaintiffs' Musical Compositions and Sound Recordings into Defendant's television programming, and Defendant having systematically and improperly caused such programming to be illicitly broadcast to the general public for commercial gain, Plaintiffs have received no compensation stemming from the exploitation of the Musical Compositions and Sound Recordings.

69. It is inequitable and unjust for Defendant to retain those gains, advantages, and benefits.

70. Defendant has enriched themselves at the expense and to the detriment of Plaintiffs.

71. Defendant should not in equity and good conscience be permitted to retain the benefit bestowed on them by the Plaintiffs.

72. As a result of the retention of such benefit, Defendant has been unjustly enriched and are liable to Plaintiffs.

73. As a result of the unjust enrichment of Defendant, Plaintiffs have incurred damages in an amount to be determined at trial, plus applicable interest, and costs.

COUNT V
UNFAIR COMPETITION
(*In the Alternative - Against Defendant*)

74. Plaintiffs repeat and re-allege each and every allegation contained in paragraphs 1 thru 32 as if fully set forth herein.

75. Defendant actions pertaining to the Musical Compositions and the Sound Recordings were designed to derive a commercial benefit.

76. Defendant conduct alleged above constitutes unlawful, unfair or fraudulent business practices in violation of California Business & Professions Code §§ 17200 *et seq.*

77. Despite not reaching any agreement of any kind regarding any exploitation or use of Plaintiffs' Musical Compositions and Sound Recordings, Defendant proceeded to exploit Plaintiffs' copyrighted works for commercial gain.

78. Defendant infringing actions, including the unauthorized use and distribution of Plaintiffs' Musical Compositions and Sound Recordings, created unfair competition in the marketplace for the copyrighted works.

79. Defendant has continuously engaged in intentional and willful unfair trade practices and unfair competition against Plaintiffs to Plaintiffs' irreparable damage in an amount to be proven at time of trial.

COUNT VI
FRAUD
(Against Defendant)

80. Plaintiffs repeat and re-allege each and every allegation contained in paragraphs 1 thru 32 as if fully set forth herein.

81. Defendant, through the use of knowingly false cue sheets, made material misrepresentations to, among other performance rights societies, the American Society of Composers, Authors and Publishers ("ASCAP") with respect to the actual music compositions broadcast to the general public, including but not limited to, in connection

with the following television series: America's Next Top Model.

82. Defendant knew that Plaintiffs, as artists, wholly-rely upon the foregoing representations, in particular, the cue sheets, to properly reflect the musical compositions actually exploited through broadcasts, to ensure a proper receipt of performance royalties.

83. Defendant further knew that ASCAP, as a performance rights society, was heavily relying upon the foregoing representations in their efforts to properly distribute performance royalties to their respective artists.

84. At the time Defendant made the foregoing material representations, through the form of knowingly false cue sheets, Defendant was at all times aware that such representations were false when made.

85. In justifiable reliance on Defendant material misrepresentations, ASCAP has failed to properly remunerate Plaintiffs their rightful performance royalties with respect to the exploitation of their Musical Compositions and Sound Recordings as broadcast through Defendant television programming.

86. As a direct and proximate result of Defendant misrepresentations, Plaintiffs have suffered significant and extensive damages and financial injury.

COUNT VII
NEGLIGENT MISREPRESENTATION
(Against Defendant)

87. Plaintiffs repeat and re-allege each and every allegation contained in paragraphs 1 thru 32 as if fully set forth herein.

88. Defendant, through the use of improper cue sheets, made material misrepresentations to, among other performance rights societies, ASCAP with respect to the actual music compositions broadcast to the general public, including but not limited to, in connection with the following TV series: America's Next Top Model.

89. Defendant knew that Plaintiffs, as artists, wholly rely upon the foregoing

representations, in particular, the cue sheets, to properly reflect the musical compositions actually exploited through broadcast, in order to ensure a proper receipt of performance royalties.

90. Defendant knew that ASCAP, as a performance rights society, was heavily relying upon the foregoing representations in their efforts to properly distribute performance royalties to their respective artists.

91. Defendant either knew of their misrepresentations, made the misrepresentations with knowledge as to their truth or falsity, or made the misrepresentations under circumstances in which they ought to have known of their falsity.

92. In justifiable reliance on Defendant material misrepresentations, ASCAP has failed to properly remunerate Plaintiffs their rightful performance royalties for the exploitation of their Musical Compositions and Sound Recordings as broadcast through Defendant's television programming.

93. As a direct and proximate result of Defendant fraudulent misrepresentations, Plaintiffs have suffered significant and extensive damages and financial injury.

COUNT VIII
ACCOUNTING
(As Against All Defendants)

94. Plaintiffs repeat and re-allege each and every allegation contained in paragraphs 1 thru 32 as if fully set forth herein.

95. Upon information and belief, Defendant received, and continue to receive, substantial revenues from the systematic and improper broadcasting of television programming incorporating Plaintiffs' Musical Compositions and Sound Recordings.

96. Accordingly, Plaintiffs are entitled to a full accounting of all revenues received by Defendant in connection with the Defendant's infringing programming incorporating and using the subject Musical Compositions and Sound Recordings.

REQUEST FOR RELIEF

WHEREFORE, Plaintiffs Delray Richardson p/k/a Delray d/b/a Del Funk Boy Music and Sterling A. Snyder d/b/a Zion Records respectfully request that this Honorable Court enter a final judgment in their favor and as against Defendant CBS Studios, Inc. d/b/a CBS Television Distribution, as follows:

- (i) Determining that Defendant has infringed on Plaintiffs' copyrights in the Musical Compositions and Sound Recordings;
- (ii) That Defendant, and their agents, employees, and all other persons in active concert or privity or in participation with them, be enjoined from directly or indirectly infringing on Plaintiffs' copyrights in the Sound Recordings or from continuing to market, offer, sell, dispose of, license, lease, transfer, display, advertise, reproduce, develop, or manufacture any works derived and/or copied from the subject Sound Recordings, in whatever medium, or to participate or assist in any such activity;
- (iii) That Defendant, and all their representatives, agents, servants, employees, officers, directors, partners, attorneys, subsidiaries, and all persons under their control or acting in active concert or participation with them, be ordered to immediately post a notice on each of its respective websites stating that the prior use of the subject Sound Recordings was unauthorized;
- (iv) That Defendant, their Affiliates and licensees, immediately cease and desist from any further display, exploitation, reproduction, distribution, transmission, or other use of the Sound Recordings;
- (v) That judgment be entered in favor of Plaintiffs and against Defendant for the actual damages suffered by Plaintiffs and for any profits attributable to the infringements of Plaintiffs' copyrights in the Sound Recordings, the amount of which, at present, cannot be fully ascertained;
- (vii) That all gains, profits, and advantages derived by Defendant from their acts of infringement and other violations of law be deemed to be held in

constructive trust for the benefit of Plaintiffs;

- (ix) That Defendant be ordered to furnish to Plaintiffs a complete and accurate accounting of all gross and net profits earned in connection with their use of the subject Sound Recordings; and
- (x) That the Court grant such other and further relief as this Court deems just, proper, and equitable under the circumstances.

JURY DEMAND

Plaintiffs hereby demand a trial by jury on all issues in this action so triable.

DATED: September 13 2012

PRO PER):

Delray Richardson p/k/a Delray d/b/a Del
Funk Boy Music,

Delray M Richardson

PRO PER):

Sterling A. Snyder d/b/a Zion Records,

S.A. Snyder

Exhibit A**Episode Infringement List**

<u>Plaintiffs' Musical Works</u>	<u>Infringing Episodes of Defendants</u>
<i>Love You So</i>	S1, Ep. 5: The Girl Who Everyone Thinks Is Killing Herself - used from 29:10 until 30:20. S1, Ep. 9: The Girl Who Becomes America's Next Top Model - used from 32:14 until 33:37.
<i>I Don't Care</i>	S1, Ep. 1: The Girl Who Wants It So Bad - used from 37:24 until 38:43.
<i>Slow Down</i>	S6, Ep. 10: The Girl Who Is Going to the Moon - viewed on the Style Network.
<i>ODB</i>	S1 Ep. 4 The Girl Who Drives Everyone Crazy - used from 26:16 until 29:37.
<i>The Streets</i>	S1, Ep. 4: The Girl Who Drives Everyone Crazy - used from 28:33 until 29:29.
<i>Party</i>	S5, Ep. 13: The Girl Who Is On The Cover -viewed on the Style Network
<i>Church</i>	S3, Ep. 11: The Girl Who the Lionesses are Hunting - viewed on the Style Network.
<i>Bumpin</i>	S5, Ep. 10: The Girl Who Talks Behind Everyone's Back - viewed on the Style Network S7, Ep. 3: The Girls Who Go To Texas - viewed on the Style Network S10, Ep. 3: Top Model Makeovers - used from 30:12 until 30:23. S14, Ep. 10: Ugly-Pretty Woman - used from 32:07 until 32:23.
<i>Bongos</i>	S4, Ep. 13: The Girl Who Walks On Water - viewed on the Style Network.
<i>Latin</i>	S3, Ep. 12: The Girl Who Didn't Hug Goodbye - viewed on the Style Network.

<i>Red Balloon</i>	S3, Ep. 10: The Girl Who Goes Ballistic - viewed on the Style Network.
<i>Sexy Baby</i>	S6, Ep. 12: The Girls Go to Phuket - viewed on the Style Network.
<i>Layla Song</i>	S6, Ep. 12: The Girls Go to Phuket - viewed on the Style Network.
<i>Give It To Me</i>	S2, Ep. 11: The Girl Who Is America's Next Top Model - viewed on the Style Network.
<i>Mr. Ex feat. Delray</i>	S8, Ep. 7: The Girl Who Gets Thrown in the Pool used from 4:26 until 4:56. S13, Ep. 7: Petite Ninja Warriors used from 29:58 until 30:16. S14, Ep. 10: Ugly-Pretty Woman used from 1:14:46 until 1:15:10.

Exhibit B

Copyright Registration Documents

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America

C FORM PA
For a Work of Performing Arts
UNITED STATES COPYRIGHT OFFICE

PAu2-864-138

PAU0002864138

EFFECTIVE DATE OF REGISTRATION

4 16 04
Month Day Year

DO NOT WRITE ABOVE

DATE CONTINUATION SHEET

1

TITLE OF THIS WORK *Defunktboy Music Inc / Collection Hits*
Love you So" ABS like That" Kind of Women" I dont Care"

PREVIOUS OR ALTERNATIVE TITLES *NONE*

NATURE OF THIS WORK *See Instructions*

words AND music

2

NAME OF AUTHOR *a Delray M Richardson*

Was this contribution to the work a work made for hire?

Yes

No

AUTHOR'S NATIONALITY OR DOMICILE

Name or Country

OR Citizen of *USA*

Domiciled in _____

DATES OF BIRTH AND DEATH

Year Born *1973* Year Died *▼*

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

If the answer to either of these questions is "Yes" see detailed instructions

Anonymous? Yes No

Pseudonymous? Yes No

NOTE

Under the law the "author" of a "work made for hire" is generally the employer not the employee (see instructions). For any part of this work that was made for hire check "Yes" in the space provided give the employer (or other person for whom the work was prepared) as Author of that part and leave the space for date of birth and death blank.

NAME OF AUTHOR *b Jean-Yves Jurgenset*

Was this contribution to the work a work made for hire?

Yes

No

AUTHOR'S NATIONALITY OR DOMICILE

Name or Country

OR Citizen of *USA*

Domiciled in _____

DATES OF BIRTH AND DEATH

Year Born *1961* Year Died *▼*

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

If the answer to either of these questions is "Yes" see detailed instructions

Anonymous? Yes No

Pseudonymous? Yes No

NAME OF AUTHOR *c Delray M Richardson*

Was this contribution to the work a work made for hire?

Yes

No

AUTHOR'S NATIONALITY OR DOMICILE

Name or Country

OR Citizen of *USA*

Domiciled in _____

DATES OF BIRTH AND DEATH

Year Born *1973* Year Died *▼*

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

If the answer to either of these questions is "Yes" see detailed instructions

Anonymous? Yes No

Pseudonymous? Yes No

3

YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED *a 2005*

This information must be given if the claimant is the same as the author given in space 2 ▼

Year in all cases.

DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Complete this information ONLY if this work has been published.

Nation

4

See instructions before completing this space

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2 ▼

*Delray M Richardson
1102 E CARSON Street - A
LONG Beach, CA 90801*

TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright ▼

APPLICATION RECEIVED

APR 16 2004

ONE DEPOSIT RECEIVED

APR 16 2004

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

MORE ON BACK ▶

Complete all applicable spaces (numbers 5-8) on the reverse side of this page
See detailed instructions.

Sign the form at the bottom

DO NOT WRITE ABOVE

Page 1 of _____ pages

EXAMINED BY *Rm*

FORM PA

CHECKED BY _____

CORRESPONDENCE
 Yes

FOR
 COPYRIGHT
 OFFICE
 USE
 ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET**PREVIOUS REGISTRATION** Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

- Yes No If your answer is 'Yes', why is another registration being sought? (Check appropriate box) If your answer is 'No', do not check box A, B or C.
- a. This is the first published edition of a work previously registered in unpublished form
 - b. This is the first application submitted by this author as copyright claimant
 - c. This is a changed version of the work, as shown by space 6 on this application

If your answer is 'Yes' give Previous Registration Number **V**Year of Registration **V****5****DERIVATIVE WORK OR COMPILATION** Complete both space 6a and 6b for a derivative work, complete only 6b for a compilation
 Preexisting Material Identify any preexisting work or works that this work is based on or incorporates **V****a****6**See instructions
before completing
this spaceMaterial Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed **V****b****NONE****DEPOSIT ACCOUNT** If the registration fee is to be charged to a Deposit Account established in the Copyright Office give name and number of Account Name **V****a****7****CORRESPONDENCE** Give name and address to which correspondence about this application should be sent Name/Address/Apt/City/State/ZIP **V****b**

Delray M Richardson
 1102 E CARSON Street - A
 LONG BEACH CA 90801
 (562) 212-2281 Fax number 310-238-1987

Area code and daytime telephone number

Email *Hotmusic@juno.com***CERTIFICATION*** I the undersigned, hereby certify that I am the

Check only one ►

- author
 other copyright claimant
 owner of exclusive rights
 authorized agent of *Delray M Richardson*

Signatures or names of other copyright claimants or owner of exclusive rights

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge

Typed or printed name and date **V** If this application gives a date of publication in space 3 do not sign and submit it before that dateDate *3-29-04***8**Handwritten signature **V***x* *Delray M Richardson*

Certificate will be mailed in window envelope to this address

Name V	<i>Delray M Richardson</i>
Number/Street/Apt V	<i>1102 E CARSON Street, Apt - A</i>
City/State/ZIP V	<i>Long Beach, CA, 90807</i>

Complete all necessary spaces
 Sign your application in space 8

1. Application form
2. Nonrefundable filing fee in check or money order payable to Register of Copyrights
3. Deposit material

Library of Congress
 Copyright Office
 101 Independence Avenue, S.E.
 Washington D.C. 20559-6000

Please do not staple to
 envelope. For fastest
 service, attach the
 deposit fees
 to the back of
 your application
 and mail
 (202) 707-3000

917 U.S.C. § 502(e): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409 or in any written statement filed in connection with the application shall be fined not more than \$2,500.

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

A handwritten signature in black ink that reads "Maria L. Pallante".

Register of Copyrights, United States of America

Registration Number
SR 692-860

Effective date of
registration:
October 3, 2011

Title _____

Title of Work: Zion

Completion/Publication _____

Year of Completion: 2002

Date of 1st Publication: February 13, 2003

Author _____

■ Author: Zion Pick

Author Created: sound recording

Work made for hire: No

Citizen of: United States

Domiciled in: United States

Anonymous: No

Pseudonymous: Yes

Copyright claimant _____

Copyright Claimant: Zion Pick

92 Corporate Park, Suite C-234, Irvine, CA, 92606

Limitation of copyright claim _____

Previously registered: No

Certification _____

Name: Zion Pick

Date: September 30, 2011

Correspondence: Yes

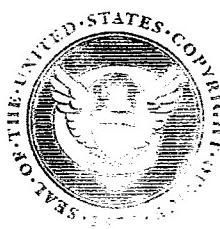
Registration #: SR0000692860

Service Request #: 1-686974061



0000SR00006928600101

**Zion Pick
92 Corporate Park, Suite C-234
Irvine, CA 92606**

Certificate of Registration

This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

A handwritten signature in black ink that reads "Maria A. Pallante".

Register of Copyrights, United States of America

Registration Number
SRU 1-073-146

Effective date of registration:
April 3, 2012

Title —

Title of Work: Delfunkboy Music & Paperwork Productions tracks library

Completion/Publication —

Year of Completion: 2000

Author —

■ **Author:** Delray M. Richardson

Author Created: music

Work made for hire: No

Citizen of: United States

Year Born: 1973

Anonymous: No

Pseudonymous: No

■ **Author:** Jean-Yves Ducornet

Author Created: music

Work made for hire: No

Citizen of: United States

Year Born: 1968

Anonymous: No

Pseudonymous: No

Copyright claimant —

Copyright Claimant: Delray M. Richardson

2191 E. 21st Street, Suite-K, Signal Hill, CA 90755

Limitation of copyright claim —

Previously registered: No

Certification —

Name: Delray M. Richardson

Date: March 27, 2012

Correspondence: Yes



0000SRU0010731460201

Registration #: SRU001073146

Service Request #: 1-763046713



0000SRU0010731460202

**Delray M. Richardson
2191 E. 21st Street, Suite-K
Signal Hill, CA 90755**

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge Audrey B. Collins and the assigned discovery Magistrate Judge is Stephen J. Hillman.

The case number on all documents filed with the Court should read as follows:

CV12- 7925 ABC (SHx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

NOTICE TO COUNSEL

- ✓ A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

Western Division
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

Southern Division
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

Eastern Division
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

FOR OFFICE USE ONLY

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Delray Richardson
See Attachment

PLAINTIFF(S)

v.

CBS Studios, See
Attachment

DEFENDANT(S).

CASE NUMBER

CV12-7925 ABC (SHx)

SUMMONS

TO: DEFENDANT(S):

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached complaint amended complaint counterclaim cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Troy Richardson, Sterling A. Snyder, whose address is 2191 G. 21st Street, Box - K, Signal Hill, CA, 90755. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Dated:

9-13-12

Clerk, U.S. District Court Clerk

By: _____



(Seal of the Court)

FOR OFFICE USE ONLY

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3).]

PRO PER:

Delray Richardson p/k/a Delray d/b/a Del Funk Boy Music
and Sterling A. Snyder d/b/a Zion Records

2191 E. 21st Street, Box - K
Signal Hill, CA 90755
323-440-0855

DELRAY RICHARDSON p/k/a DELRAY)	#Case No.:
d/b/a DEL FUNK BOY MUSIC, an)	COMPLAINT FOR:
individual, and STERLING A. SNYDER)	
d/b/a ZION RECORDS, an individual,)	
Plaintiffs,)	1. COPYRIGHT INFRINGEMENT;
v.)	2. CONTRIBUTORY COPYRIGHT INFRINGEMENT;
CBS STUDIOS, INC., d/b/a CBS)	3. VICARIOUS COPYRIGHT INFRINGEMENT;
TELEVISION DISTRIBUTION, a division)	4. UNJUST ENRICHMENT;
of CBS Corporation, a Delaware)	5. UNFAIR COMPETITION;
Corporation,)	6. FRAUD;
Defendant.)	7. NEGLIGENT MISREPRESENTATION; and
		8. AN ACCOUNTING

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

COMPLAINT FOR COPYRIGHT INFRINGEMENT AND AN ACCOUNTING

Plaintiffs Delray Richardson p/k/a Delray d/b/a Del Funk Boy Music ("Delray") and Sterling A. Snyder d/b/a Zion Records ("Snyder") (collectively "Plaintiffs") sue CBS Studios, Inc. d/b/a CBS Television Distribution ("CBS"), and state:

NATURE OF ACTION

1. This is a civil action seeking damages and injunctive relief for copyright infringement arising under 17 U.S.C. §§ 501, *et seq* (referred to herein as the "Copyright Act"), and other related causes of action.

I (a) PLAINTIFFS (Check box if you are representing yourself <input checked="" type="checkbox"/>) DELRAY RICHARDSON p/k/a DELRAY d/b/a DEL FUNK BOY MUSIC, an individual, and STERLING A. SNYDER d/b/a ZION RECORDS, an individual,	DEFENDANTS CBS STUDIOS, INC., d/b/a CBS TELEVISION DISTRIBUTION, a division of CBS Corporation, a Delaware Corporation,																							
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) DELRAY RICHARDSON 2191 E. 21st Street, Box - K Signal Hill Ca, 90755 STERLING A. SNYDER 22700 Lake forest Drive Box - 621 Lake Forest, Ca 92630	Attorneys (If Known)																							
II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table border="0"> <tr> <td>Citizen of This State</td> <td><input type="checkbox"/> PTF</td> <td><input type="checkbox"/> DEF</td> <td><input type="checkbox"/> PTF</td> <td><input type="checkbox"/> DEF</td> </tr> <tr> <td>Citizen of Another State</td> <td><input type="checkbox"/> 1</td> <td><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business in this State</td> <td><input type="checkbox"/> 4</td> <td><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td><input type="checkbox"/> 2</td> <td><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td><input type="checkbox"/> 5</td> <td><input type="checkbox"/> 5</td> </tr> <tr> <td></td> <td><input type="checkbox"/> 3</td> <td><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td><input type="checkbox"/> 6</td> <td><input type="checkbox"/> 6</td> </tr> </table>	Citizen of This State	<input type="checkbox"/> PTF	<input type="checkbox"/> DEF	<input type="checkbox"/> PTF	<input type="checkbox"/> DEF	Citizen of Another State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5		<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
Citizen of This State	<input type="checkbox"/> PTF	<input type="checkbox"/> DEF	<input type="checkbox"/> PTF	<input type="checkbox"/> DEF																				
Citizen of Another State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4																			
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5																			
	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																			
IV. ORIGIN (Place an X in one box only.) <input checked="" type="checkbox"/> 1 Original <input type="checkbox"/> 2 Removed from State Court <input type="checkbox"/> 3 Remanded from Appellate Court <input type="checkbox"/> 4 Reinstated or Reopened <input type="checkbox"/> 5 Transferred from another district (specify): <input type="checkbox"/> 6 Multi-District Litigation <input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judge																								
V. REQUESTED IN COMPLAINT: JURY DEMAND: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Check 'Yes' only if demanded in complaint.) CLASS ACTION under F.R.C.P. 23: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No MONEY DEMANDED IN COMPLAINT: \$ 2,500,000																								
VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.) 17 U.S.C. §§ 501, et seq.																								
VII. NATURE OF SUIT (Place an X in one box only.)																								
OTHER STATUTES <ul style="list-style-type: none"> <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/ Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes 	CONTRACT <ul style="list-style-type: none"> <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property 	TORTS <ul style="list-style-type: none"> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions 	TORTS <ul style="list-style-type: none"> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights 	PRISONER PETITIONS <ul style="list-style-type: none"> <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 Habeas Corpus General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE / PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other 	LABOR <ul style="list-style-type: none"> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWV (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <input type="checkbox"/> 870 FEDERAL TAX SUITS Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609 																			

FOR OFFICE USE ONLY: Case Number: **CV12-7925**

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? No Yes
If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? No Yes
If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) A. Arise from the same or closely related transactions, happenings, or events; or
 B. Call for determination of the same or substantially related or similar questions of law and fact; or
 C. For other reasons would entail substantial duplication of labor if heard by different judges; or
 D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named plaintiff resides.
 Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
DELRAY RICHARDSON p/k/a DELRAY d/b/a DEL FUNK BOY MUSIC, -Los Angeles County	
STERLING A. SNYDER d/b/a ZION RECORDS, - Los Angeles County	

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named defendant resides.
 Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
CBS STUDIOS, INC., d/b/a CBS TELEVISION DISTRIBUTION, a division of CBS Corporation, a Delaware Corporation, - Los Angeles County	

(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH claim arose.
Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
L A	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER): Delray Richardson Date 9-13-2012

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))